**via posting**

**TO:** NAESB Gas-Electric Harmonization (GEH) Forum Participants and Interested Industry Parties

**FROM:** Elizabeth Mallett, NAESB Director, Wholesale Gas Quadrant (WGQ) and Retail Markets Quadrant (RMQ)

**RE:** Staff Notes from theNAESB Gas-Electric Harmonization Forum Meeting – June 16, 2023

**DATE:** June 22, 2023

Dear NAESB Gas-Electric Harmonization Forum Participants,

A NAESB Gas-Electric Harmonization (GEH) Forum meeting was held on June 16, 2023 at 9:00 AM Central. Mr. Gee, Ms. Tierney, and Mr. Wood presided over the meeting. The notes below reflect the NAESB staff summary of the meeting.

A recording of the meeting has been posted on the NAESB GEH Forum webpage: <https://naesb.org/recordings/geh061623recording.mp4>.

The chat log from the meeting has been posted on the NAESB GEH Forum webpage: <https://naesb.org/pdf4/geh061623chat.docx>.

| **Notes from the June 16, 2023 NAESB Gas-Electric Harmonization Forum Meeting** |
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| **Administrative** | Mr. Booe welcomed the participants and provided the antitrust guidance. He stated that this is the twelfth meeting of the NAESB GEH Forum over a period of ten and a half months, resulting in the development of a significant record. Mr. Booe stated that the GEH Forum will now move into its next phase and determine the recommendations for actions that will be included in a final report that will be submitted to FERC and NERC. He stated that, during the meeting and the next two meetings on June 29th and July 13th, the participants will discuss the NAESB GEH Forum Chairs’ Strawman Recommendations(Strawman). Mr. Booe thanked Mr. Gee, Ms. Tierney, and Mr. Wood for reviewing the record and developing the Strawman. He noted that, at the conclusion of the process, the participants will have an opportunity to vote on the final recommendations that will be included in the report to FERC and NERC. The Strawman contains a list of nineteen recommendations for action that were taken from the record of oral and written comments, including the chat logs, that were produced over the last eleven GEH Forum meetings. That list of nineteen recommendations is followed by summaries of the GEH Forum record addressing the topic areas relevant to each recommendation. Mr. Booe noted that the planned Argonne National Laboratory presentation on the NGinsight tool was postponed until the next GEH Forum meeting and, for that reason, the first three recommendations in the Strawman, which are related to the tool, will not be discussed until the next meeting. Mr. Wood stated that, during the June 2023 FERC Open Session Meeting, the 2021 report regarding Winter Storm Uri was mentioned in the presentation delivered by the FERC, NERC, and Regional Entity Joint Team concerning the December 2022 Winter Storm Elliot inquiry into bulk power system operations. He stated that the presentation contained a lot of familiar information and consistent themes and expressed his appreciation for the current FERC leadership and commit to resolving these important issues.Ms. Tierney thanked the NAESB staff for organizing the meeting materials and thanked the GEH Forum participants for their engagement in the process. Mr. Gee stated that the presentation during the June FERC Open Session Meeting reflected that the issues now discussed in the GEH Forum regarding Winter Storm Uri are still pervasive throughout the rest of the country. He stated that the GEH Forum Chairs are open to constructive criticism on the Strawman and asked the participants to comment on any improvements that can be made to the recommendations. Mr. Gee suggested that the participants consider the coming changes to the industry status quo and urged them to seize this opportunity to influence that change.Ms. Polzin stated that the NAESB GEH Forum was mentioned during the June 2023 FERC Open Session Meeting and noted that the FERC is looking forward to the final report. She explained that FERC Staff has observed the GEH Forum meetings and has been struck by the thoughtfulness in the participation and the comments that have been submitted. Mr. Desselle encouraged the GEH Forum participants to also consider the timelines associated with any recommendations. |
| Review of the *NAESB GEH Forum Chairs’ Strawman Recommendations* | The GEH Forum began its review of the *NAESB GEH Forum Chairs’ Strawman Recommendations* with Recommendation 4.*Recommendation 4: In a manner similar to the FERC NOPR concerning the Coordination of the Scheduling Processes of Interstate Natural Gas Pipelines and Public Utilities issued on March 20, 2014 (Docket No. RM14-2-000), the FERC should direct the natural gas and electric industries to revise the business practice standards developed by NAESB to improve the efficiency and transparency of the processes to report, transact, and facilitate capacity release.*Mr. Smith asked how the recommendation relates to the record summary and the future GEH Forum voting. He stated that the recommendation was drafted narrowly, but the record summary touches upon other topics. Mr. Booe stated that the record summaries reflect the comments and discussion that were related to the topics/areas identified by the Chairs. He explained that Mr. Gee, Ms. Tierney, and Mr. Wood asked the NAESB Staff to capture the record around each of the topics/areas in order to develop the Strawman recommendations. Mr. Booe also noted that, at the end of the process, votes will be taken on each of the recommendations, not on the final report or record summaries, and that the final report will be similar to other NAESB reports drafted as part of previous efforts. Ms. Tierney explained that the summary of the record will be amplified with the meeting minutes and the comments provided. Mr. Gee stated that the reasoning behind the recommendations will be included in the final draft of the report. Mr. Booe stated that the Strawman is merely a work paper that captures the record of comments and discussion on the topics/areas noted. Ms. Tierney explained that the recommendations contained in the Strawman come from the Chairs of the GEH Forum, as NAESB does not offer a point of view. She stated that the Chairs thought it would be helpful for FERC and NERC to actually hear a point of view coming out of the meetings.Mr. Smith asked whether the recommendations, especially Recommendation 4, are intended to apply to interstate, intrastate, or both. Mr. Wood noted that Recommendation 12 contains a separate recommendation on capacity release from Recommendation 4. Mr. Glazer asked about the intent of the word “processes” in the phrase “the processes to report, transact, and facilitate capacity release” is not clear. Mr. Gee stated his concurrence and noted that he will discuss deleting the phrase “of the processes” from Recommendation 4. Ms. Tierney agreed with the deletion.Ms. Bagot stated that it is not clear that Recommendation 4 is about pipeline capacity release and asked whether both the gas and electric participants would be participating in the proposed development of any proposed capacity release standards. Mr. Booe stated that the capacity release standards are contained in the NAESB WGQ Business Practice Standards and explained that the NAESB standards development process does allow the electric industry to participate in the development of wholesale gas standards. Ms. Tierney stated that she read the language of the recommendation to apply to pipeline capacity release, but a clarification can be made, if needed.Ms. Jagtiani asked for more input on the purpose of Recommendation 4. She stated that NGSA members find capacity release flexible and easy to use and consider NAESB standards regarding capacity release as a mechanism for timing issues. Ms. Jagtiani stated that the record refers to information transparency and incentivizing those holding capacity to timely release it. She asked whether those topics are intended to be included as NAESB directive or something broader. Mr. Wood stated that he agreed that the language does seem to invite some changes to how FERC defines the program. He stated that the phrase “the improvement of efficiency and transparency” may be too open ended. Ms. Chambers asked the participants to keep in mind that there are capacity release rules set forth in the regulations and, under the Commission’s capacity release program, there are requirements for posting the capacity release and timing requirements as well. She recommended that there be a specific definition of what the recommendation would change, if anything.Mr. Agen suggested removing the reference to the 2014 FERC Notice of Proposed Rulemaking (NOPR) and suggested that company names be removed from the demand response recommendation. Mr. Booe explained that the reference to the NOPR process was added as an example because, in that NOPR, FERC requested that NAESB take action on an effort with a specific deadline. Mr. Gee supported deleting the reference to the 2014 NOPR in Recommendation 4. Mr. Eaton asked whether Recommendation 4 applies to extreme weather only. Ms. Tierney stated that the recommendation was intended to be broad, not only for extreme weather. Mr. Wood stated that there is another recommendation that refers to extreme weather. Mr. Booe added that the Chairs developed a few recommendations that applied to extreme weather specifically.*Recommendation 5: The FERC should consider policy modifications necessary to better facilitate advanced agreements between end users and providers of natural gas supply and delivery capacity similar to those adopted as part of FERC Order No. 712 to support the use of asset management agreements.*Ms. Jagtiani stated that, recently, NGSA’s position on the value of exchange agreements in the real world has evolved. She questioned how many industrials would have a large enough load to meet the needs of a power generator and noted that such an arrangement would need to be local and may need to be preauthorized by the pipeline. Ms. Jagtiani stated that, given the factors of localization, capacity, and supply concerns, the occurrence may be rare. She suggested that additional feedback on this topic from the generators would be helpful before discussing any policy recommendations.Ms. Bagot asked whether the “policy modifications” to encourage asset management agreements or arrangements in Recommendation 5 are directed at industrials. She stated that EPSA has seventeen members who are all sophisticated generation owners and operators experienced with arrangements. She stated that she is concerned with the term “policy modifications.” Ms. Jagtiani stated her support for asset management agreements so generators can make total use of the firm capacity they have and noted that her comments on the topic referred to end users and generators. Ms. Tierney stated that she interpreted the recommendation to modify FERC Order No. 712 and not the overall recommendation and, therefore, it was aimed at the bilateral arrangements between different end users. She asked whether further inquiry is needed into industrial users to determine whether it will spur more resource availability. Ms. Jagtiani indicated that there are likely waivers that would be required to effectuate the exchanges and acknowledged that FERC instituted similar waivers for natural gas asset management agreements (AMAs) in FERC Order No. 712. Ms. Bagot suggested changing the language to address removing barriers. Ms. Jagtiani suggested that the waivers should only be available during a critical event or emergency period because there are other mechanisms for attaining day-to-day capacity and supply in the normal market. She stated this would take you outside of the normal markets and facilitates the emergency reallocation. Ms. Chambers stated that the important part of Recommendation 5 is to have an agreement in advance that could be quickly implemented during an emergency. She stated that it should not be something that you have to do during the peak emergency period. Ms. Chambers stated that removing barriers would be more useful than having to file waivers because that takes time and it is not efficient.Recommendation 6: *State public utility commissions and applicable state authorities in states with competitive energy markets should engage with producers, marketers and intrastate pipelines to ensure that the natural gas markets are fully functioning on a 24/7 basis in preparation for and during events in which demand is expected to rise sharply for both electricity and natural gas, including weekends and holidays. Per current FERC regulations, interstate pipelines schedule and operate on a 24/7 basis to support the wholesale natural gas market. In instances where state authorities lack enabling authority to take such actions, the FERC should adopt regulations to achieve identical outcomes.*Mr. Glazer asked whether Recommendation 6 is directed to the availability of products on the intrastate, interstate, or both. Mr. Wood stated that Recommendation 6 is intrastate because it is production oriented. Mr. Glazer stated that he would not assign Recommendation 6 solely to the states because they cannot take on the issue alone. He noted that there are a lot of factors that can help improve the liquidity, including the RTO tariffs, the end user requirements, and marketer actions. Mr. Gee stated that there is concern that the regulation and oversight of intrastate production and gathering is not meeting the challenge to sufficiently supply the market with natural gas. He stated that there is room for improvement on the interstate level, but this recommendation is primarily focused on state oversight, especially in Texas where most of the state production is situated. Mr. Gee stated that the intention was to ask FERC to consider the issue and exerts its jurisdiction, if any exists, in the event that state commissions cannot. Mr. Glazer suggested a parallel recommendation for the interstate markets. Mr. Wood concurred and noted that Recommendation 6 is broad and that FERC has potential discretionary authority to backstop this, if needed.Mr. Wolf stated that Kinder Morgan supports states looking into these recommendations, but, with respect to Recommendations 6, 12, and 13, the language should be modified to reflect the limitations of FERC’s statutory authority. He stated that FERC’s authority over those pipelines not offering Section 311 service, is limited and FERC does not have any more authority than what is given to it under the Natural Gas Policy Act of 1978 Mr. Wolf stated that Kinder Morgan recommends the deletion of the last sentences of Recommendations 6, 12 and 13, or alternatively, the modification of the language to request that FERC consider whether it has the authority to adopt the changes. Mr. Wood noted that the Texas Railroad Commission has stated that they do not have the authority in some of these areas, even over the basic areas of transparency. He stated that as far as reporting and disclosure, there is broader authority than the Natural Gas Policy Act that would apply in some of the recommendations. Mr. Wolf stated that, if the Texas Railroad Commission does not have the authority, that is an issue for the Texas legislature.Mr. Smith stated that, in the Strawman, the recommendation does not seem to match up with the record summary because the recommendation targets intrastate pipelines, but the record summary refers to nomination cycles and modifications to the no bump rule in Intraday 3 of the Gas Day. He suggested that the record summary directly relate to the Strawman recommendations without extraneous material which could confuse the vote. Mr. Booe stated that the overall topic area was Natural Gas Market Scheduling Opportunities, Including Weekend, Holiday, and Critical Events and that Mr. Gee, Ms. Tierney, and Mr. Wood, reviewed the record, which contained a lot of information about interstate pipelines scheduling practices, and determined to isolate the issue of getting access to the natural gas markets during weekends, holidays, and critical events as identified in the recommendation. Mr. Booe encouraged the participants to read the recommendations in the context of the larger conversations of all of the GEH Forum meetings on the summary topic/area, not just what was included in the record summaries of the Strawman. He noted that the final report will not include updated record summaries.Ms. Chambers stated that the pipeline participants are not convinced that 24/7 nominations will fix the problems because people would nominate at a time when there is a shortage of pipeline capacity and, if those nominating do not have firm supply, the product will not be delivered. She stated that deleting the language referring to the interstate pipelines would provide clarity to Recommendation 6.Recommendation 7: *The Independent System Operators (ISOs) and Regional Transmission Organizations (RTOs), through stakeholder processes, or the FERC, through initiating and conducting proceedings, should adopt changes to align day-ahead electric scheduling practices with the natural gas day, including earlier notification of successful bids, to ensure that schedules are known and made available to allow natural gas-fired generators to procure natural gas and pipeline capacity in periods when the market is most liquid.*Ms. Bagot suggested that Recommendation 7 reflect the need for analysis on the improvements that could be attained by better aligning the gas or power days or both, while avoiding unintended consequences. She stated that it could be as simple as moving the power day time, rather than the full scheduling process, and noted that the operations vary by region. For example, New York has a much earlier timeline then the other Eastern RTOs.Mr. Glazer stated that some generation units that showed availability in real time, were not available. He stated that multi-day unit commitments should be considered along with the with pros and cons; however, it would be hard to draft a set of universal recommendations due to regional differences. Mr. Glazer stated that these are active topics being discussed in each region. He suggested that the recommendation be drafted at a higher level that recognizes regional differences. Ms. Tierney stated that she supports further analysis, as proposed by Ms. Bagot, and, in light of Mr. Glazer’s comments, she asked the participants if they believe there is an entity that should conduct the analyses. Mr. Glazer stated that FERC could drive teh discussion forward, but the data is tied up with tariffs, clearing, and compensation to generators. Mr. Gee noted that this recommendation is purposely broad to recognize the regional differences. He noted that state utility commissioners have continuously asked why the gas and electric days are different and explained that their perception is that the days have not yet been aligned. He added that the solution is probably not a one size fits all answer, but the issue of alignment should be discussed. Mr. Glazer stated that both Recommendations 7 and 8 use the phrase “should adopt” and suggested that the phrase be replaced with “should analyze.” Mr. Gee stated that “should consider” could be inserted in place of “should adopt.”Mr. Desselle stated his support for the language of the recommendation including the phrase “through stakeholder process, or the FERC.” He stated that NAESB did this many years ago and there is no reason why the industries should not sit down at the table and look at realignment again. Mr. Desselle stated that, if state regulators perceive this as a problem, it should be analyzed. Ms. Bagot stated that FERC can direct one-time reports on the issue, which would require RTOs and ISOs to do the analysis, show that their current practice works best for their market, and that the practices are just and reasonable. She stated that the analyses and report could, alternatively, start a conversation to consider changes. Ms. Bagot stated that it is important to include the concept of the power day itself, not just the scheduling timeline. Mr. Spencer stated that LS Power agrees with the recommendation and stated that the broader question is what the GEH Forum is trying to achieve because it deescalates the financial risk to the generators, but may not take a material step towards enhancing electric reliability because the problem seen in the markets is the lack of day ahead awards. He stated that LS Power does not consider the recommendation a high priority item, as it will not address the RTO problems with attempting to procure gas in real time. Recommendation 8: *If not already under consideration through stakeholder processes, ISOs and RTOs or the FERC, through initiating and conducting proceedings, should adopt multiday unit commitment processes to better enable the industry to prepare for and provide reliable service during events in which demand is expected to rise sharply for both electricity and natural gas.*Mr. Spencer stated that without load participation, it would be very difficult, particularly in a cost-capped markets, for sufficient price signals to carry through the weekend or incentives for generators to carry a weekend package. He explained that, for every Winter Storm Elliot weekend, there are other weekends where the forecast shows extreme weather, but calms down later, which sets up a loss-making situation for the generator. He suggested considering cost mitigation within the markets and evaluating risk premium for generator offers to socialize, not only the losses, but also the benefits across multiple weekends. Mr. Gee stated that Recommendation 11 seems to address the latter half of Mr. Spencer’s comment. Mr. Spencer stated that the “funding mechanism” referred to in Recommendation 11 seems to imply non-market or cost recovery and LS Power would like to adhere to market principles and set the right risk and reward balance for the situation. Mr. Gee stated that Recommendation 11 considers generator losses when the weather is not as severe as forecasted. Ms. Bagot stated that it is a difficult process, due to the implementation, specifically the voluntary nature of the load offers. Ms. Chambers stated that the recommendation could be more direct and state that the generator should be able to recover the cost of the supply for multiday commitments. Mr. Glazer stated that this is a major issue that needs to be fixed, and, while multiday unit commitment processes are one solution, there are others and flexibility should be maintained.Mr. Wood stated that the recommendation should focus on critical periods, but those periods are vaguely defined and differ from one state to another. Mr. Booe stated that NAESB held several meetings this year to discuss the definition of the term “Extreme Weather Operating Conditions,” but did not come to a conclusion. Mr. Gee stated that high level plain English language should be used in the report to limit the protocol to extreme weather events, however that term is defined.Recommendation 9: *State public utility commissions should encourage local distribution companies within their jurisdictions to structure incentives for the development of natural gas demand response programs, such as those being piloted by National Grid USA and Southern California Gas Company, and/or voluntary natural gas conservation public service announcements for residential, commercial and industrial customers in preparation for and during events in which demand is expected to rise sharply for both electricity and natural gas.*Mr. Booe stated that the record included feedback related to the development of natural gas demand programs. Mr. Glazer stated that Recommendation 9 should include electricity conservation, not just natural gas. He explained that he is trying to work with state emergency announcement systems similar to that used effectively within California. He stated that it is a state-by-state effort and would appreciate any support in this process to achieve uniformity. Mr. Glazer agreed to send some language for the Chairs to consider.Mr. Agen stated that the main feedback from AGA members on Recommendation 9 was that this should apply to electric companies as well, to respond to overall energy demand. Ms. Jagtiani stated that there have been a lot of calls to determine whether local distribution companies will release their capacity. She stated that the language could include the fact that some states allow for sharing revenues associated with releasing capacity. She stated that there might be a way to encourage more releases through revenue sharing. Ms. Jagtiani stated that demand response during constrained periods may not make a substantial difference, but having sufficient infrastructure will. She noted that a lot of the recommendations have sufficient infrastructure interwoven into the language. For example, funding capacity and storage is an important issue, the infrastructure is not disregarded, but more woven throughout the recommendations.Recommendation 10: *State public utility commissions with integrated resource planning or equivalent planning requirements should consider ways to improve upon cross-market, long-term planning by expanding collaboration requirements by relevant gas and electric market parties and considering an increased focus on fuel adequacy.*Mr. Booe stated this recommendation is specific to the states and concerns cross-market communication concerning long term planning. Mr. Gee stated that much of Recommendation 10 came from Mr. Glazer’s comments on the need for joint planning. Mr. Glazer stated that the planning is actually under FERC authority and the idea is to integrate better RTO long term planning with pipeline long term planning, as well as in the interconnection process. Mr. Gee stated that that sounds more federal than state oriented. Mr. Glazer stated that the phrase “equivalent planning requirements” was code for including federal jurisdictional requirements as well.Recommendation 11: *FERC, state public utility commissions and applicable state authorities in states with competitive energy markets should consider whether market mechanisms are adequate to ensure that jurisdictional generators have the necessary arrangements for secure firm transportation and supply service and/or storage to avoid and/or mitigate natural gas supply shortfalls during extreme cold weather events, and if not, determine whether non-market solutions are warranted, including funding mechanisms borne or shared by customers.*Ms. Bagot stated that, in Recommendation 11, the inclusion of the final clause “funding mechanisms borne or shared by customers” directly follows the non-market solutions. She noted that Mr. Spencer was referring to a market solution earlier in the meeting. Ms. Bagot stated that she read the language to mean, for example, an RTO will procure pipeline capacity on behalf of ratepayers. She stated it was specifically tied to non-market solutions. Ms. Bagot stated that market mechanisms should be assessed and non-market approaches are a second-best approach that should be kept on the table.Mr. Gee and Mr. Wood agreed that non-market mechanisms should be considered by the industry along with market mechanisms. Ms. Bagot stated that, in the PJM Interconnection analyses on fuel supply, the generators with a day ahead commitment had much lower fuel supply concerns than those without the day ahead commitments. She stated that to assume a firm supply arrangement is mostly a day ahead issue. Ms. Bagot explained, in that case, the generators can say with certainty that they had a firm supply arrangement because they were committed on a timely basis. Mr. Gee stated that the language of Recommendation 11 states that FERC should consider whether market solutions are adequate and, if not, determine whether non-market solutions are warranted. Ms. Bagot stated that she would work on potential suggestions to the language. Mr. Gee encouraged the participants to submit written comments. Mr. Wood stated that the term “non-market” may be a mischaracterization because, even the surgical subsidies that ERCOT is working on for the PUC have competitive bids. Mr. Glazer stated that Recommendation 11 is helpful and that he views the recommendation as a three-tiered process. First, ask “Are the existing market mechanisms adequate?” If not, then ask “What can you do within the market mechanisms to improve those mechanisms?” Mr. Glazer stated that the third step, if the first two do not work, is considering the non-market solutions. He provided an example with capacity performance. Mr. Glazer stated that when it was clear that just relying on penalties alone did not work, a combination of penalties and upfront requirements were considered. He noted that there is still competitive bidding and it is still a market mechanism.Ms. Jagtiani stated that PJM Interconnection did show that, on one day during Winter Storm Elliot, generators that had fuel supply issues and outages had not cleared the day ahead market. She stated that Recommendation 11 refers to secure firm transportation and supply service and/or storagewhich is building the portfolio and setting up tools for buying. Ms. Jagtiani stated that if a generator has not cleared the day ahead, but is then called on the day of, it becomes a challenge. She explained that the two issues are separate, the generators need to make appropriate prior arrangements, but they also need the ability to purchase gas before it becomes unavailable. Mr. Glazer stated that generator units that are flagged as available and, then suddenly are not, leads to a scramble. He stated that it is more complicated than just the day ahead. Mr. Spencer stated that the challenge is that the gas is available the day ahead, but becomes less liquid as you get closer to real time. He explained that, as the day unfolds, it is less predictable. Ms. Chambers stated that, in Winter Storm Elliot, demand was higher than what was forecasted and a more conservative forecast would have helped. She noted that some of the generators were unavailable and others were dispatched at a time when gas was unavailable. Also, some generators may not have had firm transport arrangements.Mr. Wood stated that the insufficiency of infrastructure is a substantial issue, but power generation is starting to utilize less natural gas, leading to increased risk with additional infrastructure costs. He asked how much companies will invest to alleviate these crunch days when it may only be a limited phenomenon. Ms. Chambers stated that there is a big gap between the rate at which coal is retiring versus the rate that renewables are coming on line. She explained that there is a reliability issue because there are not enough resources coming on line quick enough. Ms. Chambers added that it may not be just a five-to-ten-year issue, as EIA has just changed their natural gas projections to reflect the usage of more gas for a longer period of time. She stated that the industry is also looking at converting these pipelines to hydrogen, so it will not be a waste of infrastructure. |
| **Next Steps & Other Business** | Mr. Booe thanked the Chairs and the participants for their time and comments. During the next meeting, Argonne National Laboratory will provide a presentation on the NGinsights tool and discussion will begin on the first three recommendations in the Strawman and then return to Recommendation 12. Mr. Booe encouraged the participants to submit written comments on the recommendations. |
| **Adjourn:** | The meeting was adjourned at 12:00 PM Central. |
| **Work Papers Provided for the Meeting:** | **Meeting Related Documents*** Announcement and Agenda:
* Antitrust Guidance and Other Meeting Policies: <http://www.naesb.org/misc/antitrust_guidance.doc>.

**Meeting Materials*** Argonne National Laboratory Presentation: <https://naesb.org/pdf4/geh061623w2.pdf>.
* NAESB GEH Forum Chairs’ Strawman Recommendation: <https://naesb.org/pdf4/geh061623w1.doc>.
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| **Attendees:** | * Please see the posted participant attendance record: <https://naesb.org/pdf4/geh061623a2.docx>.
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